

AO 91 (Rev. 11/11) Criminal Complaint

FILED

DEC 30 2015

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

Clerk, U.S. District Court
Texas Eastern

United States of America

v.

ALBERTO HERNANDEZ-CHAVEZ (1)
ARMANDO DIEGO PINA-ALVAREZ (2)
FRANCISCO JAVIER CRUZ-GONZALEZ (3)
JESUS ANGULO-TORRES (4)
EDWARD LAERCIO GONGORA-AGUIÑO (5)
RICARD MOISES QUIJJE-CHAVEZ (6)
ROGER ALFREDO ANCHUNDIA-ESPIÑOZA (7)

Case No.

4:15MJ507

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2015 to the present in the county of Collin in the
Eastern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 846

21 USC 963

21 USC959 and 18 USC 2

46 USC 70503(a) and 70506(a)&(b)

Conspiracy with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine
Conspiracy to import cocaine and manufacture and distribute cocaine intending and knowing that the cocaine will be unlawfully imported into the United States
Manufacturing and distributing cocaine intending and knowing that the cocaine will be unlawfully imported into the United States and aiding and abetting
Conspiracy to possess with the Intent to Distribute Cocaine while Onboard a Vessel Subject to the Jurisdiction of the United States

This criminal complaint is based on these facts:

See the attached affidavit of Special Agent Joe H. Mata, DEA

☐ Continued on the attached sheet.

Complainant's signature

SA Joe H. Mata DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/30/2015 3:40pm

Judge's signature

City and state: Sherman, Texas

Honorable Christine A. Nowak, Magistrate Judge

Printed name and title